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June 25, 2014

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Ex Parte Presentation – CG Docket No. 02-278

Dear Ms. Dortch:

On June 24, 2014, Adam Benshoff of National Grid and I met with Kurt Schroeder, Chief of the Consumer Policy Division; John Adams, Deputy Chief of the Consumer Policy Division; and Richard Smith, Counsel to the Consumer Policy Division (Mr. Smith participated by phone). We met to discuss National Grid's Petition for Declaratory Ruling and/or Waiver submitted on February 18, 2014 (the "Petition"). The Petition seeks confirmation that a "d/b/a" name that is registered at the relevant State Corporation Commission (or comparable regulatory authority) satisfies the rule requirements set forth in 47 C.F.R. § 64.1200(b)(1). In the alternative, the Petition seeks a waiver to allow National Grid to use its registered d/b/a name when placing prerecorded calls.

National Grid provided information to assist the Commission's understanding of the issues presented in the Petition. Mr. Benshoff and I explained that National Grid is an electric and gas utility operating in Massachusetts, New York, and Rhode Island. Under the National Grid umbrella are various operating companies with historical legacy names that are retained for background utility regulation purposes and cost allocation purposes, but are not used for any customer-facing purpose. For example, the Nantucket Electric Company is a subsidiary of National Grid (USA), Inc. The name Nantucket Electric Company d/b/a National Grid is used for purposes of dealing with the utility regulatory authorities in Massachusetts. However, for purposes of dealing with customers, National Grid is the only name used for such interaction, and is thus the only name that customers are familiar with.

National Grid provided the slides attached to this letter to demonstrate National Grid's use of its registered d/b/a name throughout its service areas. As shown in the slides, customer invoices are sent under the National Grid name. Service trucks and employee uniforms bear the name of National Grid. Also, the customer service website and email contacts are under the National Grid name. In short, all customer-facing interaction is accomplished under the name National Grid. National Grid has registered its d/b/a name with the appropriate state or local authorities (depending on the jurisdiction's requirements).

Mr. Benshoff and I also explained that National Grid uses prerecorded calls for various customer service purposes. For example, if there is an impending storm that may result in power outages, National Grid will place prerecorded calls to alert customers who require medical care equipment of anticipated bad weather and related possible power outages, so that they can take precautions and make preparations for their medical care in the event of a power outage. National Grid also places prerecorded calls to notify customers of upcoming service appointments. These prerecorded calls are an important tool that National Grid uses to keep its customers informed of service issues on a timely basis.

We also explained that, under 47 C.F.R. § 64.1200(b)(1) and the related implementing orders, National Grid states the legal name of the business and the National Grid d/b/a name when placing prerecorded calls.¹ Thus, in Nantucket, a prerecorded call would state both the historical legacy name – the Nantucket Electric Company – as well as the National Grid registered d/b/a name.

National Grid's customer service call center has received calls from customers who have reported confusion over the use of the historical legacy company names, since they understand their utility provider to be National Grid. To avoid customer confusion and maximize customer convenience, National Grid would prefer to use only the National Grid name on the prerecorded calls.

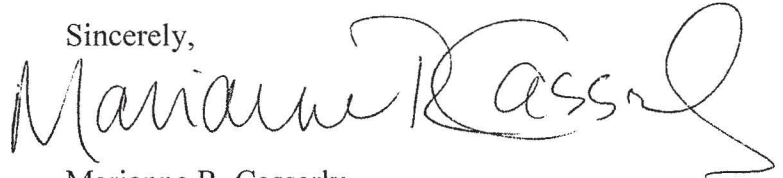
¹ See, e.g., *In the Matter of Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991, Report and Order*, 18 FCC Rcd. 14014, para. 144 (2003); *In the Matter of Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991, Second Order on Reconsideration*, 20 FCC Rcd. 3788, para. 41 (2005).

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Mr. Benshoff and I explained that this is important customer relations issue to National Grid. Thus, we urged the Commission to issue a ruling confirming that use of a d/b/a name that has been registered at the relevant State Corporation Commission (or comparable regulatory authority) satisfies the rule requirements set forth in 47 C.F.R. § 64.1200(b)(1). In the alternative, National Grid seeks a waiver to allow its use of its registered d/b/a name.

Sincerely,

A handwritten signature in black ink, reading "Marianne R. Casserly". The signature is fluid and cursive, with the first name "Marianne" and last name "Casserly" clearly legible.

Marianne R. Casserly

Encl.

cc: Kurt Schroder, Chief of the Consumer Policy Division
John Adams, Deputy Chief of the Consumer Policy Division
Richard Smith, Counsel to the Consumer Policy Division
Adam Beshoff, Senior Counsel, National Grid

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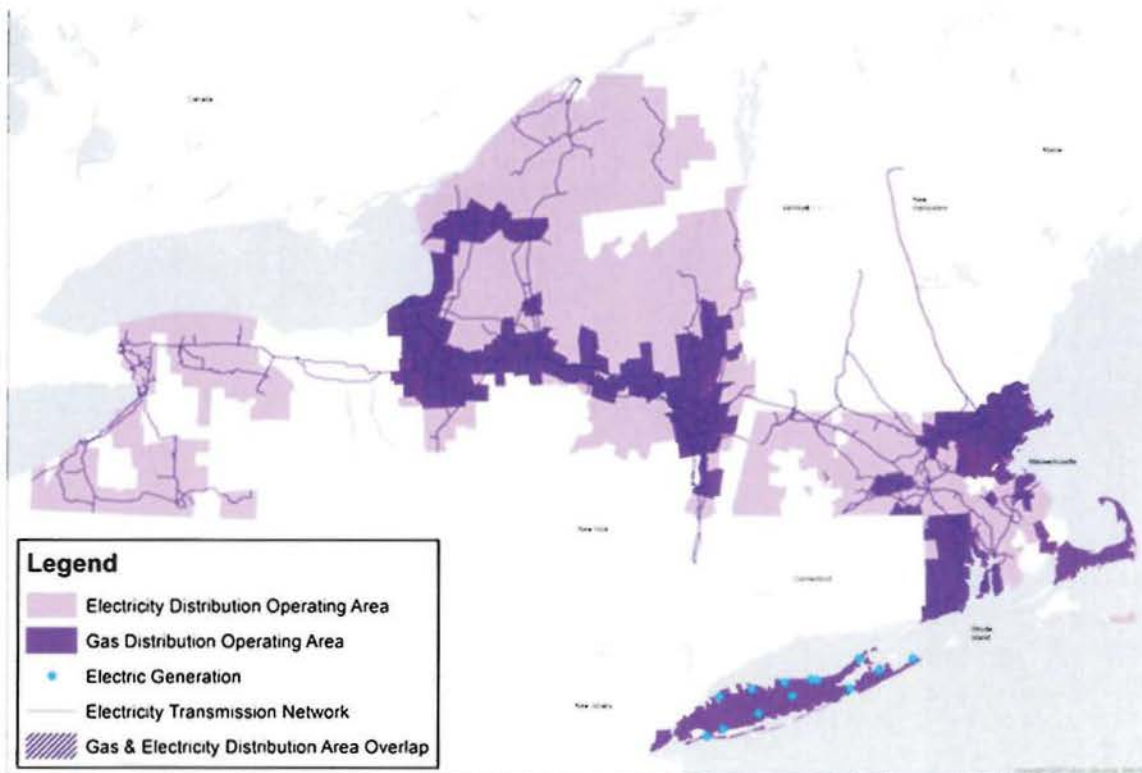
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Federal Communications Commission

June 24, 2014





Electricity Transmission owner & operator

- Largest electricity transmission service provider in NE and NY
- 10,000 miles of transmission (680 substations)
- Own, operate 139 miles of a key section of HVDC interconnect to deliver clean Hydro power from Canada into New England

Electricity Distribution owner and operator

- 3.3m customers
- 122,000 circuit miles

Electricity Generation

- 57 electricity generation units on Long Island that provide ~4GW under contract to LIPA

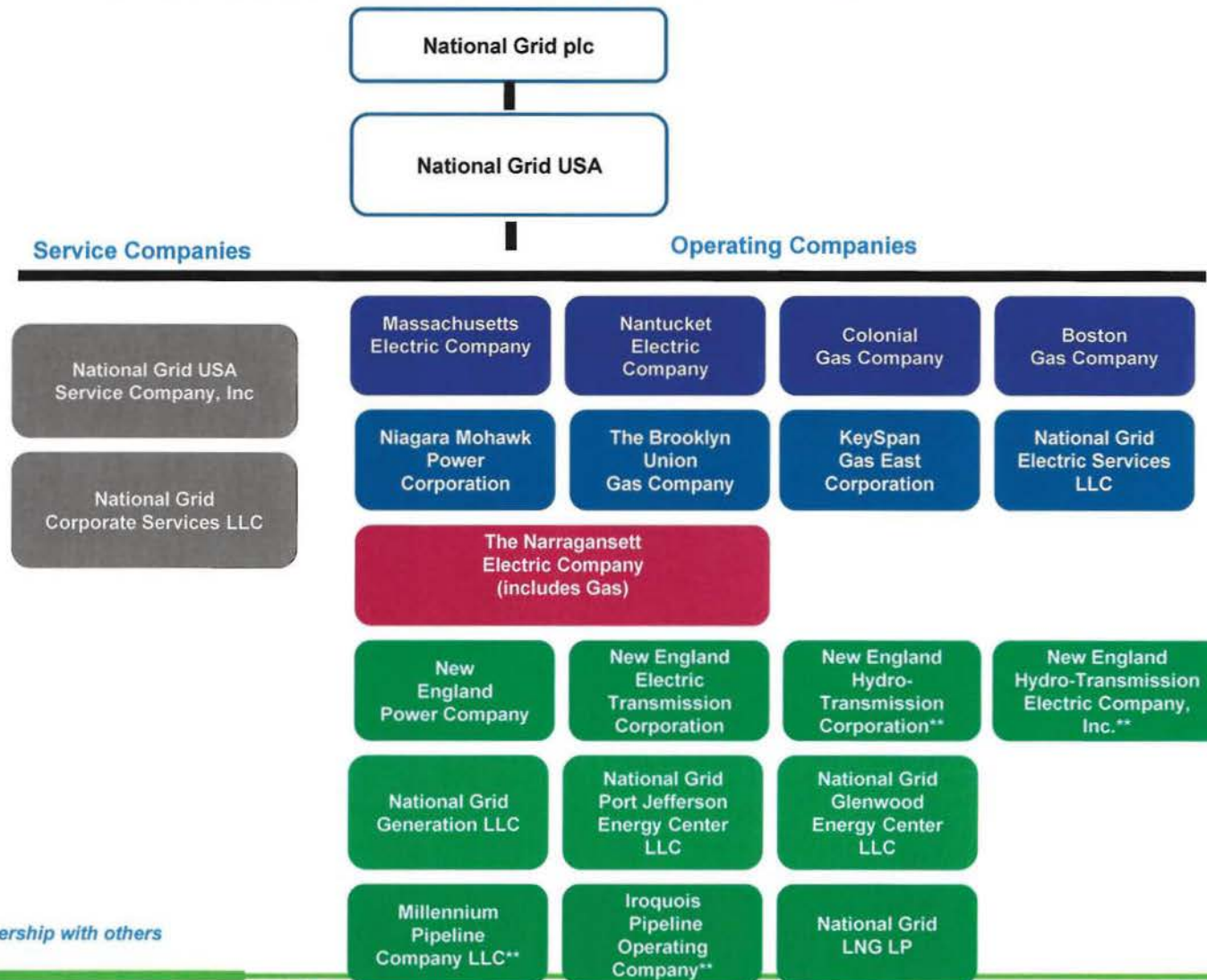
Gas Distribution owner

- 3.4m consumers across NE and NY
- 32,000 miles of gas main and pipe

Gas Storage

- 19 LNG facilities

National Grid Corporate Structure

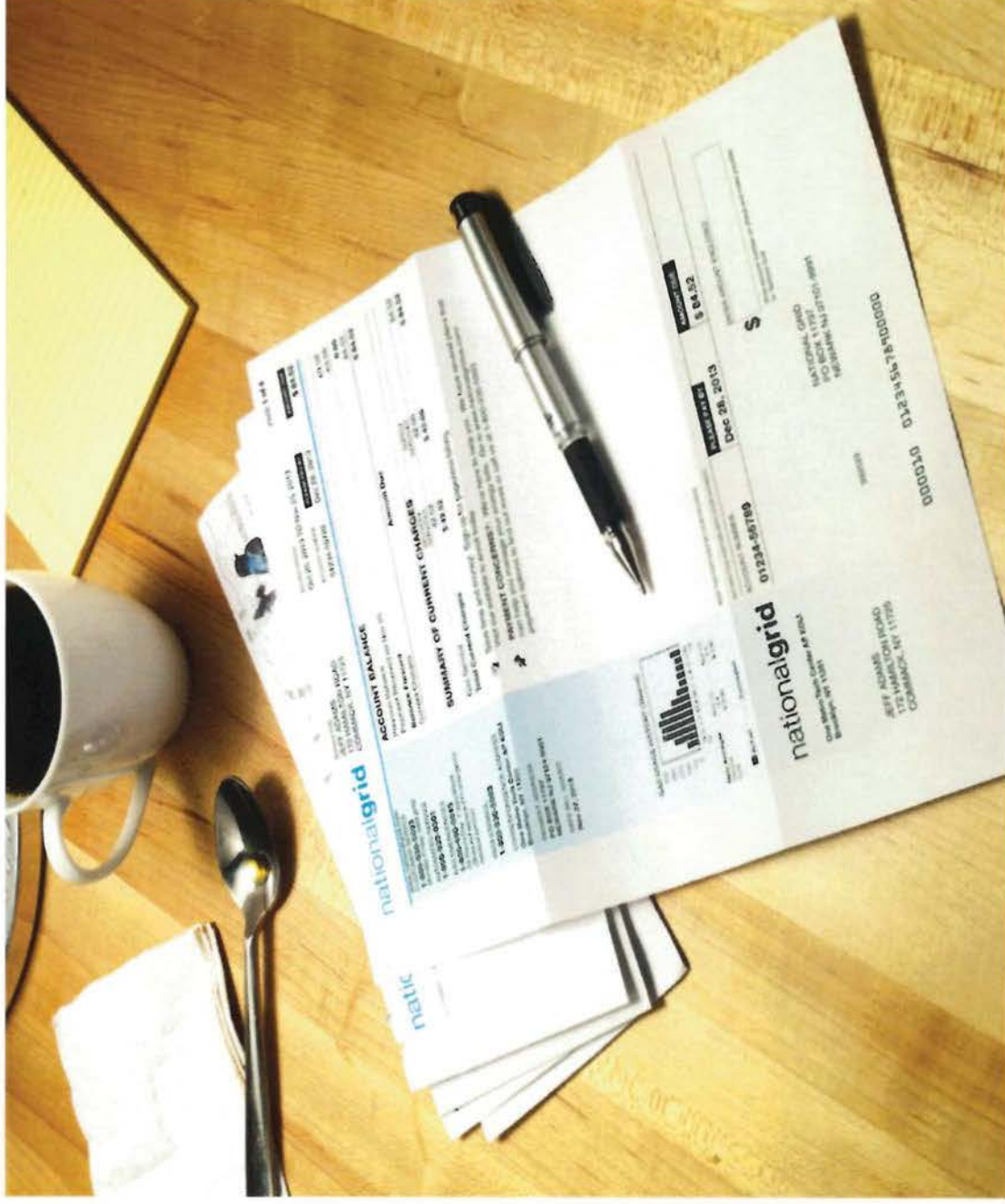


FERC
Jurisdiction

** Ownership with others

Sample Bill

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Sample Bill inserts

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Restoring your natural gas service

Water damage to your home or business may have resulted in disconnection from our natural gas system. It is our goal to restore your natural gas service as safely and quickly as possible.

Each property will be evaluated on a case-by-case basis. As a result of the widespread damage caused by Hurricane Sandy, repair or replacement of gas lines, heat or air conditioning equipment or replacement of meters or other equipment may be necessary.

Repair or replacement of your heating system or other appliances may also be needed before natural gas service is restored.


In general, these steps will be required to restore service:

1. An assessment of the condition of the gas equipment at the property (both National Grid and customer owned).
2. Repair and/or replacement of our equipment or customer owned appliances.
3. At least one, and possibly additional visits to the property by our meter services employees to test, inspect and relight pilot lights.

For further information about the restoration of your natural gas service, please call:

Brooklyn, Queens and Staten Island
718-643-4050

On Long Island and the Rockaways
1-800-930-5005



Flood waters can permanently damage gas and electrical equipment. Even if the equipment dries out, contaminants can affect electronics and moving parts. Corrosion is likely and is often hidden where it cannot be seen. This can lead to failure and can cause fires, even if the equipment appears intact and functions after drying out. Please consult professional electrical, heating and cooling service providers. Replacement is the preferred remedy.

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At your service

Getting to know our programs and services



Important Numbers and Contacts

24-Hour Emergency Gas Safety Service

Massachusetts 1-800-235-5325

Dig Safe® 811 or 1-888-DIG-SAFE

Gas Theft 1-781-538-2812

Other

Gas Heat Conversion 1-877-MyNGnd
(1-877-696-4743)

Billing Information Refer to number
on your gas bill

TTY Service 771

Energy Efficiency 1-800-292-2032
www.nationalgrid.com/energyefficiency

Web site
www.nationalgrid.com

E-Mail
onlinecustomerservice@ngd.com

www.nationalgrid.com

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